

Hearing Date: October 23, 2019 at 10:00 am (ET)
Objection Deadline: October 16, 2019 at 4:00 pm (ET)

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Attorneys for Hankook Tire America Corp.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No.: 18-23538 (RDD)
Jointly Administered

**NOTICE OF HEARING ON THE MOTION OF HANKOOK TIRE
AMERICA CORP. FOR RELIEF FROM (A) THE ORDER (I) APPROVING
THE ASSET PURCHASE AGREEMENT AMONG SELLERS AND BUYER,
(II) AUTHORIZING THE SALE OF CERTAIN OF THE DEBTORS' ASSETS
FREE AND CLEAR OF LIENS, CLAIMS INTERESTS AND ENCUMBRANCES,
(III) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS, AND LEASES IN CONNECTION THEREWITH
AND (IV) GRANTING RELATED RELIEF; AND(B) RELATED SALE AND
ASSUMPTION/ASSIGNMENT PLEADINGS AND ORDERS**

PLEASE TAKE NOTICE that a hearing on the annexed motion (the "Motion") of Hankook Tire America Corp. ("Hankook"), by its counsel Montgomery McCracken Walker & Rhoads LLP, for an order granting Hankook relief from the Sale Order¹ and any related pleadings/orders, pursuant to Fed. R. Civ. P. 60, made applicable herein by Fed. R. Bankr. P. 9024, will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street,

¹ All undefined capitalized terms used herein shall have the meaning ascribed to them in the accompanying Motion.

White Plains, New York 10601 on October 23 at 10:00 a.m., or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion must be made in writing, filed with the Court electronically in accordance with General Order M-399 and the *Amended Order Implementing Certain Notice and Case Management Procedures* [Dkt No. 405] (the “Amended Case Management Order”) by registered users of the Court’s electronic case filing system and, by all other parties in interest, mailed to the Clerk of the United States Bankruptcy Court, 300 Quarropas Street, White Plains, NY 10601-4140, on a compact disc, in text-searchable portable document format (PDF) (with a hard copy delivered directly to the Chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, 300 Quarropas Street, White Plains, NY 10601-4140), and served in accordance with General Order M-399 or other form upon Edward L. Schnitzer, Esq., Montgomery McCracken Walker & Rhoads LLP, 437 Madison Avenue, New York, New York 10022, so as to be actually received no later than October 16, 2019 by 4:00 p.m.

PLEASE TAKE FURTHER NOTICE that the relief requested in the Motion may be granted without a hearing if no Objection is timely filed and served in accordance with the Amended Case Management Order.

Dated: October 2, 2019
New York, New York

**MONTGOMERY MCCracken WALKER &
RHOADS LLP**

By: /s/ Edward L. Schnitzer
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